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January 31, 2017

VIA ECF

Honorable Paul G. Gardephe
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Kim v. Favre et al., Case No. 16cv-1522 (PGG)

Dear Judge Gardephe:

Our office represents the Defendants FX Communications + Medial LLC and Xavier Favre in the matter referenced above.

Pursuant to the settlement agreement between Margaret Kim and FX Communication + Media LLC and Xavier Favre, the parties have agreed to settle the above referenced matter in exchange for payment by Defendants of sixty-five thousand dollars (\$65,000.00) in monthly installments according to the following schedule:

- \$25,000 due on or before January 15, 2017
- \$6,666.67 due on or before February 15, 2017
- \$6,666.67 due on or before March 15, 2017
- \$6,666.67 due on or before April 15, 2017
- \$6,666.67 due on or before May 15, 2017
- \$6,666.66 due on or before June 15, 2017
- \$6,666.66 due on or before July 15, 2017

Defendants intend to fulfill their obligations with respect to this matter, however, due to issues with the settlement of the estate of Mr. Favre's father who passed away late last year, Defendants have had a difficult time freeing up the required sum that became payable on January 15, 2017. Our client has informed us that he will be able to transfer the first payment to our escrow by Friday, February 3, 2017, at which time we will promptly disburse the amount to Plaintiff's counsel.

Our client is deeply apologetic for the inconvenience this has caused and appreciates your Honor's and the plaintiff's patience. Our office will notify the court promptly once the funds are received in our escrow account.

Respectfully Submitted,

MORRISON TENENBAUM, PLLC



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Cc: Plaintiff's Counsel (Via ECF)